

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IN RE:

Erica L. Cohen

Debtor

Case No.: 18-19364

Chapter: 13

Judge David D. Cleary

**LIMITED OBJECTION TO MOTION TO AUTHORIZE SALE UNDER 11 USC §363
FILED ON 04/10/2020**

NOW COMES JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, and/or its assigns (hereinafter “Movant”), by and through its attorneys, Codilis & Associates, P.C., and files this limited objection to Debtor’s Motion to Authorize Sale and in support thereof states as follows:

1. Debtor filed a petition under Chapter 13 of Title 11, United States Bankruptcy Code on 7/11/2018 and this Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois;

2. Movant is the holder of both a first and second mortgage on Debtor’s primary residence located at 1600 Hadley Court # A2, Wheeling, IL 60090 (Permanent Index Number 03-04-302-037-1538) (hereinafter “Subject Property”);

3. Movant has no objection in theory to the proposed sale of the Subject Property; however, Movant requests the following:

- a. That both the first and second lien of Movant be paid in full from the proceeds of the sale;
- b. That the contemplated sale be concluded within 120 days of the entry of any order authorizing sale;
- c. That any short sale offer is subject to Movant’s final approval;

WHEREFORE, JPMORGAN CHASE BANK, NATIONAL ASSOCIATION prays this Court enter an Order including Movant's requested verbiage above, or for such other and further relief as this Court may deem just and proper.

Dated this April 17, 2020.

Respectfully Submitted,
Codilis & Associates, P.C.

By: /s/ Brenda Likavec

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NOTE: This law firm is a debt collector.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Objection upon the parties listed below, as to the Trustee and Debtor's attorney via electronic notice on April 17, 2020 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on April 17, 2020.

Marilyn O Marshall, Chapter 13 Trustee, 224 South Michigan Ste 800, Chicago, IL 60604 by electronic notice through ECF

Erica L. Cohen, Debtor, 1600 Hadley Ct. Unit A2, Wheeling, IL 60090

David M Siegel, Attorney for Debtor, 790 Chaddick Drive, Wheeling, IL 60090 by electronic notice through ECF

/s/ Brenda Likavec
Attorney for Movant

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